

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c)	
ROMANO GARUBO & ARGENTIERI Emmanuel J. Argentieri, Esquire 52 Newton Avenue, P.O. Box 456 Woodbury, New Jersey 08096 (856) 384-1515 Attorney for Secured Creditor, U.S. BANK NATIONAL ASSOCIATION AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST	
FOUR THE BOYS II, LLC <i>fka</i> FOUR THE BOYS, LLC xx-xxx5633 Debtor.	Case No.: 19-19708 Chapter: 11 Judge: CMG

OBJECTION TO CONFIRMATION OF PLAN AND DISCLOSURE STATEMENT

Secured Creditor, U.S. Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust, the holder of a mortgage on the real property of the debtor commonly known as 356 Bay Lane, Mantoloking Shores, New Jersey 08738, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 11 Plan and Disclosure Statement.

Objection is made to confirmation of the proposed Plan and Disclosure Statement in the event that:

- (a) the Debtor seeks to modify the rights of Secured Creditor, which is the holder of a claim secured only by a security interest in real property that is the principal residence of the Debtor;

- (b) the proposed plan/DS fails to comply with the requirements of the Bankruptcy Code and is not proposed in good faith;
- (c) the proposed plan/DS does not provide that Secured Creditor retain its lien;
- (d) the value of the property to be distributed to Secured Creditor under the plan/DS is less than the allowed amount of its claim;
- (e) the proposed plan/DS is not feasible;
- (f) the proposed plan/DS fails to comply with other applicable provisions of Title 11;
- (g) the proposed plan/DS fails to provide for Secured Creditor's claim as provided for in its Proof of Claim.

Therefore, Secured Creditor respectfully requests that the court deny confirmation of Debtor's proposed Plan and Disclosure Statement.

Respectfully submitted,
Romano Garubo & Argentieri

/s/EMMANUEL J. ARGENTIERI
EMMANUEL J. ARGENTIERI

Date: 10/1/19